

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

12580

U.S. DISTRICT COURT  
CLERK

2002 AUG 12 PM 2:22

FILED

MCI WORLDCOM NETWORK SERVICES, INC., )

Plaintiff, )

v. )

ATLAS EXCAVATING, INC., )

Defendant. )

No. 02 C 4394  
Judge Moran  
Magistrate Judge  
Geraldine Soat Brown

TO: John P. Morrison/Robert R. Brown, Bell Boyd & Lloyd, LLC  
Three First National Plaza, 70 W. Madison St., Suite 3300, Chicago, IL 60602

James J. Proszek/Kimberly R. Beidler, Hall Estill Hardwick Gable Golden & Nelson P.C.  
320 South Boston Ave., Suite 400, Tulsa, OK 74103-3708

**NOTICE OF MOTION**

On August 20, 2002, at 9:00 a. m., or as soon thereafter as counsel may be heard, I shall appear before the Honorable Judge Moran or any judge in his stead, in the courtroom usually occupied by him in Room 1843, U.S. District Court, Northern District of Illinois, Eastern Division, 219 South Dearborn Street, Chicago, Illinois, and shall then and there present the attached Motion for Leave to Appear & Extend Time.

Name: Jump & Associates, P.C.  
Address: Eleven South LaSalle Street  
Telephone: (312) 629-5757

Attorney for Defendant  
City: Chicago

**DOCKETED**

**PROOF OF SERVICE**

**AUG 20 2002**

Under penalties as provided by law pursuant to 735 ILCS 5/1-109, I certify that on the 12th day of August, 2002, the document referred to in this Notice was served upon each person to whom this Notice is addressed:

- ( ) By personal delivery;
- ( ) Via facsimile;
- (xx) By placing a copy of same in an envelope properly addressed and stamped in a U.S. mail box at 11 South LaSalle Street, Chicago, Illinois.

*Unganne O'Neil*

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**MOTION FOR LEAVE TO APPEAR & EXTEND TIME**

NOW COMES DEFENDANT, ATLAS EXCAVATING, INC., by its attorneys, Jump & Associates, P.C., and moves the Court to enter an order granting it leave to file its Appearance *instante*, and further granting it an extension of time of fourteen (14) days, up to and including August 26, 2002, within which to answer or otherwise plead to Plaintiff's Complaint.

WHEREFORE, DEFENDANT, ATLAS EXCAVATING, INC., respectfully requests the Court to enter an order granting said Defendant leave to file its Appearance *instante*, and further granting an extension of time of fourteen (14) days, up to and including August 26, 2002, within which to answer or otherwise plead to Plaintiff's Complaint.

DOCKETED  
AUG 20 2002

Respectfully submitted:

**JUMP & ASSOCIATES, P.C.**

By:

R. Howard Jump

JUMP & ASSOCIATES, P.C.  
11 South LaSalle Street, Suite 2000  
Chicago, Illinois 60603  
(312) 629-5757

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